

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

SUMNER SQUARE  
1615 M STREET, N.W.  
SUITE 400  
WASHINGTON, D.C. 20036-3215

(202) 326-7900

FACSIMILE:  
(202) 326-7999

December 2, 2019

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

I write on behalf of Defendant Kingdom of Saudi Arabia (“Saudi Arabia”) concerning the above matter. As directed by the Court’s order issued on November 25, 2019 (ECF No. 5307), counsel are presently trying to ensure that copies of all documents that contain information subject to either (1) the Privacy Act Order and Protective Order for FBI documents (ECF No. 4255), or (2) the Court’s order dated July 22, 2019, partially granting Saudi Arabia’s motion to seal (ECF No. 4696), have been filed with the Clerk and placed in the vault. Before the Court’s recent clarification, counsel for Saudi Arabia had submitted these documents by electronic mail to chambers pursuant to section III(d) of your Honor’s Individual Practices in Civil Cases and had not realized that a physical filing with the Clerk’s Office was required.

Because the filings were originally prepared as electronic submissions, they are signed with typed e-signatures. The Clerk’s Office has indicated that the filings cannot be accepted for sealed filing unless hand-signed in ink or unless the Court authorizes them to be accepted in their current form. As a full printed set of the filings is now in New York for physical filing, it would expedite the process considerably if we could file them in their current form. Accordingly, we respectfully request that the Court grant such authorization.

The Addendum to this letter lists all filings to which this request applies.

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg  
*Counsel for the Kingdom of Saudi Arabia*

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**ADDENDUM**

- November 2, 2018 letter responding to Plaintiffs' supplemental discovery requests.
- December 18, 2018 letter responding to Plaintiffs' December 12, 2018 letter concerning supplemental discovery.
- December 21, 2018 opposition to Plaintiffs' motion to compel, with exhibits.
- January 8, 2019 reply letter in support of Saudi Arabia's motion to limit the scope of supplemental discovery.
- January 15, 2019 Exhibit A to Saudi Arabia's letter-motion on confidentiality.
- January 25, 2019 letter reply in support of Saudi Arabia's letter-motion on confidentiality, and Exhibit C to the same.
- February 21, 2019 letter responding to Plaintiffs' February 20, 2019 letter.
- March 25, 2019 letter responding to Plaintiffs' March 22, 2019 letter.
- June 18, 2019 letter concerning depositions, plus two exhibits.
- June 21, 2019 opposition to Plaintiffs' motion to compel against the FBI.
- June 27, 2019 Exhibits A, B, and C to letter with final copies of deposition transcripts.
- July 17, 2019 letter responding to Plaintiffs' July 15, 2019 letter.
- August 19, 2019 opposition to motion to vacate.
- August 19, 2019 opposition to objections to sealing order.
- August 19, 2019 opposition to motion to reconsider / Rule 72 objections.
- September 12, 2019 response to Plaintiffs' September 9 letter, with exhibits.
- October 8, 2019 appendix to letter concerning document production.
- October 28, 2019 letter-motion for protective order.
- November 4, 2019 letter responding to Plaintiffs' November 1 letter.
- November 6, 2019 letter responding to Plaintiffs' November 1 discovery motion.
- November 13, 2019 reply letter regarding scheduling order.
- November 13, 2019 reply letter regarding protective order.